

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

JACK P. DeJESUS,
Plaintiff,

v.

Civil Action No. 4:23-cv-158

WILLIAM J. BURNS, Director,
Central Intelligence Agency,
Defendant.

**LOCAL CIVIL RULE 5(C) NOTICE OF DEFENDANT’S MOTION TO SEAL
PLAINTIFF’S NOTICE OF FILING (ECF NO. 27)**

Pursuant to Local Civil Rule 5(C), Defendant, William J. Burns, Director, Central Intelligence Agency (the “Agency”), respectfully provides notice of Defendant’s Motion to Seal, which moves the Court to seal Plaintiff’s Notice of Filing (ECF No. 27).

Parties and non-parties may submit memoranda in support of or in opposition to Defendant’s Motion within seven (7) days of the date of filing of Defendant’s Motion, and may designate all or part of such memoranda as confidential. Any information designated as confidential in a supporting or opposing memorandum will be treated as sealed pending a determination by the Court on Defendant’s Motion.

Any person objecting to Defendant’s Motion must file an objection with the Clerk of Court within seven (7) days after the filing of Defendant’s Motion and if no objection is filed in a timely manner, then the Court may treat Defendant’s Motion as uncontested.

After the seven (7) day time period for filing a response or any objection to Defendant’s Motion and any further briefing ordered by the Court, the Court will determine whether the material should remain under seal. The Court may require the filer or the person designating material as confidential to present further argument why certain material should remain under seal.

If the Court determines that the appropriate standards for filing material under seal have not been satisfied, it may order that the material be filed in the public record.

Respectfully submitted,

JESSICA D. ABER
United States Attorney

By: /s/ Daniel P. Shean

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